



**CAROLIN J. NEARING**

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November 15, 2021

**VIA ECF**

The Honorable Hildy Bowbeer  
U.S. District Court Magistrate Judge  
District of Minnesota  
316 North Robert Street  
St. Paul, MN 55101  
Bowbeer\_chambers@mnd.uscourts.gov

**Re: *Anthony Valiant v. Todd Leonard et al.*  
Court file no. 21-cv-72 (WMW/HB)**

Dear Judge Bowbeer:

Counsel in this matter conferred on Monday, November 15 to discuss the status of discovery and the prospect and timing for a settlement conference or private mediation.

Necessary medical records have been collected, written discovery has been exchanged, and several principal depositions have taken place. Additional principal depositions will be taking place in the next 6-8 weeks. We also anticipate an IME of Mr. Valiant to be scheduled in early 2022. After these activities have been completed counsel will reconvene to discuss the prospect and timing for potential settlement discussions.

We are prepared to discuss the status of the case with the Court in the status conference on Friday, November 19 at 9:00 a.m. Andrew Noel will be participating on behalf of Plaintiff, the undersigned will be participating on behalf of the MEnD defendants, and Stephanie Angolkar will be participating on behalf of Wright County.

Very truly yours,

**LARSON • KING, LLP**

*s/Carolyn J. Nearing*

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